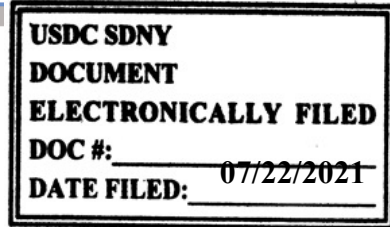




11 SUNRISE PLAZA, STE. 305
VALLEY STREAM, NY 11580
(516) 233-1660
WWW.LIEBOWITZLAWFIRM.COM

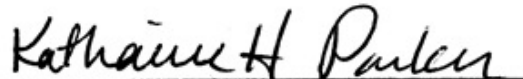
July 23, 2021

VIA ECF



Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

Re: Heidi & Hans-Jurgen GBR v. Blue Label Solutions LLC, 1:21-cv-02937 (LAK-KHP)

07/22/2021

Dear Judge Parker:

We represent Plaintiff Heidi & Hans-Jurgen Gbr in the above-captioned case. We write to respectfully request that, in light of the Clerk's entry of default against Defendant Blue Label Solution LLC ("Defendant") [Dkt. No. 16], the Court adjourn the initial case management conference scheduled for August 3, 2021 sine die [Dkt. No. 12], and permit Plaintiff to file its motion for default judgment under Fed.R.Civ.P. 55(a)(2) within thirty (30) days.

- 1) the original date of the conference is August 3, 2021 at 11:30 a.m.;
- 2) no previous requests for an adjournment have been made;
- 3) no previous requests were granted or denied;
- 4) Defendant has defaulted and therefore does not consent nor oppose this request.

The requested adjournment does not impact any other scheduled dates.

Respectfully Submitted,

s/**jameshfreeman**/
James H. Freeman

Counsel for Plaintiff